

Defenders of Wildlife
1534 Mansfield Ave.
Missoula, MT 59801
406-549-0761

Resource Organization
on Timber Supply
P.O. Box 1936
Lewiston, ID 83501
208-937-9922

RECEIVED BY U.S. FISH
AND WILDLIFE SERVICE
GRIZZLY BEAR RECOVERY
COORDINATORS OFFICE

DEC 01 1997

National Wildlife Federation
240 N. Higgins, #2
Missoula, MT 59802
406-721-6705

Intermountain Forest
Industry Association
200 East Pine St.
Missoula, MT 59802
406-542-1220

November 26, 1997

Dr. Chris Servheen, Grizzly Recovery Coordinator
U.S. Fish and Wildlife Service
Box 5127
Missoula, MT 59806

Dear Chris:

Please consider the following comments on behalf of Defenders of Wildlife, the Intermountain Forest Industry Association, the National Wildlife Federation and the Resource Organization on Timber Supply concerning the draft environmental impact statement on Grizzly Bear Recovery in the Bitterroot Ecosystem.

We want to commend the Service both for including the Citizen Management alternative in the EIS and for selecting it as the preferred alternative. The Service did an excellent job of accurately taking our proposal and translating it into an EIS alternative. The citizen management concept is a new and innovative idea, developed by groups who believe that giving local citizens more involvement in grizzly bear recovery will result in improved conservation. We think the Service's endorsement of a proposal that reduces its own authority underscores how far your agency is willing to go to assist endangered species recovery.

Our recommendation is simple: We support the Citizen Management alternative as improved by the changes suggested by Governor Racicot and by our comments below. We plan to continue our efforts to widen the circle of people who support this concept through ongoing discussions that incorporate new ideas where it improves the proposal. We do not believe Alternative 1 is the perfect strategy, but we believe it is an excellent first step which everyone can help improve upon. While we strongly support Alternative 1, our groups do have several concerns about the draft EIS which we urge you to address:

1. The Service proposes in the draft EIS that bears for reintroduction will be obtained from Canada and from the Yellowstone and Northern Continental Divide Ecosystems. We want to stress that we cannot support removal of bears from either of these ecosystems if it influences the Service's ability to meet recovery goals. We recognize

there may be circumstances where bear removal does not affect recovery criteria. Currently in Yellowstone bears exist outside of recovery zone boundaries where their presence does not influence recovery goals. To the extent some of these bears reside in habitats where potential conflicts are high, relocation to wilderness habitats could be a positive conservation measure.

1 We also seek greater assurance from the Service that bears will be available from Canadian populations for reintroduction if bears are not available from U.S. populations, as well as documentation that removal of grizzlies from Canada will not have a deleterious impact on those populations.

2 2. We recommend the Service convenes the Citizen Management Committee at the earliest possible date and gets it involved in sanitation and public education efforts. It's not clear from the DEIS when the Citizen Management Committee will be established. We urge the Service to form the committee as soon as a final decision is made. We support the decision not to initiate reintroduction until 1999 because we believe the Citizen Management Committee can play a pivotal role both with sanitation and public education efforts.

3 3. We are concerned that the draft EIS does not analyze what the most desirable number of bears for reintroduction should be. The draft EIS calls for capture and relocation of a minimum of 25 bears over a period of five years. While we recognize that at some level these numbers are driven by the logistical reality of how many bears are available for relocation and how many can be captured, we would appreciate a summary of the best science on the appropriate numbers of bears to maximize chances for a successful reintroduction.

3 We are mindful of the recent effort to augment grizzly populations in the Cabinet Mountains, where the Service proposed to reintroduce two bears per year for two years. The conclusion based on that effort seems to be that significantly more bears need to be reintroduced to establish a population in an unoccupied area. We would like to know what the leading experts believe is the right number of bears for a successful reintroduction. Also, we would like you to clarify whether the EIS's call for a "minimum" of 25 bears means there is no specific constraint on the precise number of bears that could be introduced.

4 4. Beyond projections regarding the amount of funding necessary to sustain the reintroduction proposal, the draft EIS does not detail how funding obligations will be met over the long-term. To the extent state agencies feel they have been forced to carry a disproportionate part of grizzly funding needs, it would be beneficial for the Service to detail its commitment to funding Bitterroot grizzly restoration. Governor Racicot of Montana has requested that the Service provide written assurances from the Secretary of the Interior that the costs of grizzly restoration will be met through specific grants. We urge the Secretary of Interior to make such commitments and publish the letter as an appendix in the final EIS. Such funding should cover both reintroduction and funds toward the recovery and potential delisting of bears in the Yellowstone and Northern Continental Divide Ecosystem.

5. We have heard two conflicting criticisms of the citizen management proposal: 1) it allows the Secretary of the Interior to abolish the citizen committee and reassume

authority too easily; and 2) it doesn't provide adequate corrective actions if the committee's actions fail to lead to recovery of the grizzly. We assume you will hear these concerns as well. We are concerned that some people have misunderstood the intent of our proposal, and we want to clarify it for you.

Our goal is to restrict the Secretary's ability to arbitrarily reassume authority, yet still assure the Secretary can reassume authority if the committee does not live up to its conservation responsibilities. By requiring the Secretary to notify the citizen management committee if its actions are not leading to recovery, by requiring the Secretary to list proposed corrective actions, and by giving the citizen committee at least six months to resolve the problems, we felt we provided an adequate buffer to an arbitrary reassumption of Secretarial authority.

5 We agree, however, with Governor Racicot's suggestions that the authority of the citizen committee should be maintained unless there is "solid, scientific evidence that its decisions are not leading to the recovery of the grizzly bear" and that any disputes between the Secretary and Citizen Management Committee should be resolved by a committee of scientists. We also agree that the committee should be involved in revisions of the Bitterroot chapter of the grizzly recovery plan. We believe these changes strengthen our proposal and we endorse their inclusion.

6 6. Another concern that has been voiced frequently during the public comment period is that special interests will dominate the Citizen Management Committee. We urge the Service to take whatever steps possible to ensure political appointees do not usurp the committee. We have one suggestion: Require the governors of Montana and Idaho to consider nominations from minority leaders of natural resource committees in their state legislatures as well as from county commissioners. Such nominations should be accompanied by written material that documents the nominees' "diversity of knowledge and experience in natural resource issues" as well as their "commitment to collaborative decisionmaking". Written nominations will better allow the public to judge whether nominees meet the standard of being "a cross-section of interests reflecting a balance of viewpoints".

7 7. We are concerned about the conclusion in the EIS summary section that grizzly bear recovery in the Bitterroot Ecosystem would have net economic benefits of \$40 to \$60 million per year. Although the Service adequately explains the methodology and limitations of "willingness to pay" estimates, the document provides no such qualification elsewhere. While such estimates have utility in academic circles, their believability is suspect in practical debate and seem to defy common sense. We are concerned that these conclusions undermine the overall credibility of the document.

8 8. While the EIS did a good job of reviewing information on habitat quality within the experimental population area, we think it's important for the Service to take advantage of opportunities in 1998 to gather additional information on habitat quality, especially south of the Salmon River. We also urge the Service to incorporate the data on habitat quality in this area that has been developed by Dr. David Mattson.

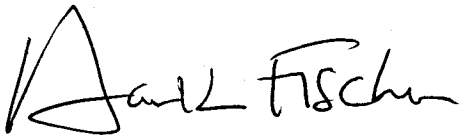
9. Some have suggested the recovery area should be amended to exclude portions of the south end of the Frank Church River of No Return Wilderness. We oppose such a

change. The citizen committee is empowered to address and resolve problems if they develop. At this early juncture there is no good reason to assume that conflicts in the wilderness would be irresolvable.

Our coalition continues to meet with groups and individuals concerned about Bitterroot grizzly restoration. We are looking for ideas that improve our proposal and broaden the level of public support. We plan to meet with the Service near the end of the public comment period to discuss various suggestions we have received.

Thank you for consideration of these comments.

Sincerely,



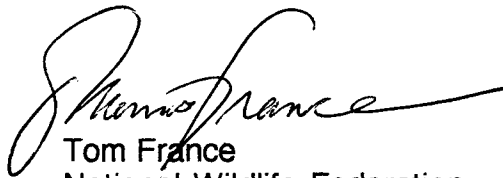
Hank Fischer
Defenders of Wildlife



Greg Schildwachter
Intermountain Forest Industry Assn.



Bill Mulligan
Resource Organization On
Timber Supply



Tom France
National Wildlife Federation